

## **Grand Mesa, Uncompahgre and Gunnison National Forests—Forest Plan Revision Comment Guide**

There are a few important points you need to know about how the Forest Service considers comments. If you are going to take time to comment, you want it to count so please consider the following information.

Substantive comments (defined at 36 CFR 219.62) provide factual information, professional opinion, or informed judgment that is relevant to the action being proposed. Substantive comments are specific, comparative, or solution-oriented. A substantive comment provides the reasons why and goes beyond just expressing an opinion. Comments such as “The proposed action looks good” (example of a non-specific comment) is not substantive. We want to know why the proposed action looks good, “The proposed action looks good because it....” Substantive comments might include providing new information, identifying issues, providing the basis or rationale for an opinion, or identifying sources of credible research which could be considered for the environmental analysis.

This is not a voting process. Comments are considered on basis of content not quantity. While all comments will be considered, we find substantive comments related to the proposed actions the most useful.

### **Examples of Substantive Comments:**

- Please change the scenic integrity objective guideline for Management Area 2 to high because the Idaho Roadless Area lands are important scenic resources of the plan area.
- In the “xxx area”, I feel strongly that lands in Management Area 2 should have active timber management to manage wildlife risk for the nearby communities. Please see the attached County Land Use Plan that identifies infrastructure and community values that are at risk from nearby dense timber stands.
- I am concerned about loss of wildlife habitat due to the spread of invasive plant species. I think the Forest Service should be monitoring for new invasive species occurrences.

### **Examples of Non-Substantive Comments:**

Non-substantive comments are those outside the scope of the proposal, appear as a “vote” (the NEPA process is not about voting), do not provide supporting rationale, or lack sufficient specificity to be tied to an issue or help us develop alternatives (i.e., emotional and without rationale). These comments are not helpful to develop alternatives or identify issues for analysis.

Examples:

- I do not support this project at all. It is not in the best interest of the general public. (Lacks specific information)

- Please close Road #xxx. (Site-specific travel management is outside the scope of forest plan revision) • Please incorporate by reference my comments on project XX (Lacks information specific to this proposed action)
- The Clean Water Act should be repealed. (Legislative actions are outside the scope of forest plan revision) T. Peel 2 7/22/2014

### **Why It's Important—Eligibility to Object**

Following the environmental analysis, when the Forest is ready to finalize the revised forest plan and issue a record of decision, there will be a pre-decisional administrative review period (described in 36 CFR 219 Subpart B of the 2012 Planning Rule (Federal Register, Vol. 7, No. 68, p 21162-21276)). This is also known as the objection period. This process gives an individual or entity an opportunity for an independent Forest Service review and resolution of issues before the approval of a plan revision. If you have unresolved issues with the revised forest plan, you may submit an objection to the draft decision at that time if you have established “standing”, or eligibility.

Substantive comments including the associated name and address of the commenter, give an individual standing to object to the decision. Anonymous comments will be accepted and considered; however will not provide standing for objection. Subpart B identifies who may file objections to a plan revision, the responsibilities of the participants in an objection, and the procedures that apply to the review of the objection (36 CFR 219 Subpart B, §219.50). Individuals and entities who have submitted substantive formal comments related to this plan revision during the opportunities for public comment for this decision may file an objection. At a minimum, there will be two opportunities for formal public comment—the 60-day scoping period for the proposed action and the 90-day comment period for the draft EIS.